Pine Belt Cellular, Inc.

3984 County Rd. 32 - P.O. Box 279 Arlington, Alabama 36722 Phone (334) 385-5000

Received & Inspected

MAR 02 2009

FCC Mail Room

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Je L. Ambs

Date filed: February 34, 2009

Name of company covered by this certification: Pine Belt Cellular, Inc.

Form 499 Filer ID: 811304

Name of signatory: John Nettles

Title of signatory: President

In response to the Federal Communications Commission's ("Commission") Public Notice, DA 09-9 (released January 7, 2009), Pine Belt Cellular, Inc. states as follows:

I, John Nettles, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. § 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed

FINANT REZ COM CHELL WILKERSON & BRYAN

> WILKERSON & BRYAN, P.C. ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET MONTGOMERY, ALABAMA 36104 TEL, 334, 265, 1500

Received & Inspected

MAR 02 2009

DANA H. BILLINGSLEY

gana a whkersondryan com

February 27, 2009

FCC Mail Room MAILING ADDRESS POST OFFICE BOX 830 36101-0830 FAX 334.265.0319

Marlene H. Dortch Office of the Secretary Federal Communications Commission, 445 12th Street, SW Suite TW-A325 Washington, DC 20554

> Pine Belt Cellular, Inc.'s Annual 47 C.F.R. § 64.2009(e) Customer Re: Proprietary Network Information (CPNI) Compliance Certification

EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Pine Belt Cellular, Inc. (hereinafter, "Pine Belt Cellular"), please find attached the annual CPNI Compliance Certification ("Certification") for Pine Belt Cellular for the year 2008 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's ("Commission") Electronic Comment Filing System on this date. Simultaneously, Pine Belt Cellular has also provided one (1) copy of the Certification to Best Copy and Printing, Inc., via electronic mail at FCC@BCPIWEB.COM, as required under the Commission's Public Notice, DA 09-9 (released January 7, 2009).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.

Dana H. Billingsley

Attorney for Pine Belt Cellular, Inc.

Wilkerson & Bryan, P.C. 405 South Hull Street

Montgomery, Alabama 36104 Telephone: (334) 265-1500

Facsimile: (334) 265-0319

Email: dana@wilkersonbryan.com

Enclosure

CC:

John Nettles

Best Copy and Printing, Inc.

No. of Copies rec'd OT List ABCDE

Pine Belt Cellular, Inc.

3984 County Rd. 32 - P.O. Box 279 Arlington, Alabama 36722 Phone (334) 385-5000

Received & Inspected

MAR 02 2009

FCC Mail Room

Before the Federal Communications Commission Washington, D.C. 20554

ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF PINE BELT CELLULAR, INC.

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Pine Belt Cellular, Inc. (hereinafter, "Pine Belt Cellular") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001 *et seq.* on behalf of Pine Belt Cellular:

- 1. I have personal knowledge that Pine Belt Cellular has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
- 2. I have personal knowledge that Pine Belt Cellular obtains written approval for the use of its customers' CPNI and that Pine Belt Cellular has notified its customers of their right to restrict Pine Belt Cellular's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
- 3. I have personal knowledge that Pine Belt Cellular has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001 et seq. and that Pine Belt Cellular has an express disciplinary process in place to deal with breaches of CPNI.
- 4. I have personal knowledge that Pine Belt Cellular implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
- 5. I have personal knowledge that Pine Belt Cellular maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties,

or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Pine Belt Cellular retains all such records for a minimum period of one (1) year.

- I have personal knowledge that Pine Belt Cellular has established a supervisory 6. review process regarding Pine Belt Cellular's compliance with outbound marketing situations and that Pine Belt Cellular maintains records of such compliance for a minimum period of one (1) year. Pine Belt Cellular's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- I have personal knowledge that Pine Belt Cellular has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this $24^{\frac{1}{2}}$ day of February, 2009.

PINE BELT CELLULAR, INC.

By:

1 / Nut

President